

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

D-1 Djuan James-Allen DAVIS, and
D-2 Nolan Demetrius DANIEL

Case: 2:22-mj-30440
Assigned To : Unassigned
Assign. Date : 10/12/2022
Case No. USA V. DAVIS, ET AL. (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2022 through August 2022 in the county of Wayne and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 472

Uttering counterfeit obligations or securities

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

Special Agent Timitre Kyriakides, Secret Service

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: October 12, 2022

City and state: Detroit, Michigan



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A COMPLAINT

I, Timitre Kyriakides, Special Agent of the United States Secret Service (USSS),
being duly sworn, state that:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent employed by the United States Department of Homeland Security, United States Secret Service, assigned to the Detroit Field Office. I have been so employed since January 2009. My responsibilities and duties include the investigation and enforcement of laws and regulations related to counterfeit investigations and financial crimes. Since June 2022, I have been assigned to the General Crimes squad, where I participate in identity theft, access device fraud, mail fraud, wire fraud, bank fraud and counterfeit United States currency fraud.
2. This affidavit is made in support of a criminal complaint and summons to appear for DJUAN DAVIS and NOLAN DANIEL for violating 18 U.S.C. §472 (uttering counterfeit obligations or securities).
3. This affidavit is submitted for the limited purpose of securing a criminal complaint and arrest warrant; therefore, this affidavit does not contain every fact that I have learned during the course of this investigation. I have only set forth the facts necessary to establish probable cause to believe that DAVIS and DANIEL violated the statutes identified above. The information

contained in this affidavit is based upon my personal knowledge, training and experience, as well as the combined knowledge, training and experience of other law enforcement officers and agents with whom I have had discussions.

4. 18 U.S.C. § 472 criminalizes whoever with intent to defraud, pass, utter, publish, or sell, or with like intent brings into the United States or keeps in possession or conceals any false made, forged, counterfeited, or altered obligation or other security of the United States.

PROBABLE CAUSE

5. Facebook Marketplace is a classified-ad section of the social network that specializes in helping individuals and businesses sell items locally. Facebook Marketplace users often also have a Facebook social media account. Like other marketplace sites, it is easy and free to set up a Facebook Marketplace profile.
6. On or about April 13, 2022, Victim #1 met an individual that Victim #1 had corresponded with on Facebook Marketplace. This individual's Facebook Marketplace profile used the name "Steve Hill." Victim #1 met "Steve Hill" in front of East Middle School in Farmington Hills to sell Victim #1's Apple iPhone 12 Max Pro. Victim #1 provided "Steve Hill" with the Apple iPhone and "Steve Hill" gave Victim #1 \$650.00 in cash. Victim #1 later discovered the cash paid to him was counterfeit. Victim #1 stated the suspect arrived at

the school in a Chrysler 300 with tinted windows and black rims.

7. On or about April 22, 2022, Victim #2 listed an iPhone 12 Pro Max on Facebook Marketplace for \$850. Victim #2 was contacted by a Facebook Marketplace profile using the name “Hill Steve.” Victim #2 met “Hill Steve” at a predetermined location to complete the sale. Victim #2 stated that “Hill Steve” arrived in a silver Chrysler 300. “Hill Steve” was seated in the front seat. An unknown black male was driving the vehicle. When Victim #2 completed the sale, he immediately recognized the money to be fake. The suspects realized that Victim #2 recognized the money to be fake and immediately fled the parking lot with the phone Victim #2 had sold them. Victim #2 got in his vehicle and followed the suspects. Victim #2 was behind the suspects’ vehicle in a roundabout and attempted to come up along the right side of the suspects’ car to get in front of them and cut them off to stop them. When Victim #2 was next to the vehicle, the suspect in the passenger seat pointed a handgun at Victim #2 through the window. Victim #2 ducked and the suspects’ vehicle turned into the front left quarter of Victim #2’s car. Victim #2 lost control of his vehicle in the roundabout, went up over the curb and crashed into a fence. Victim #2 saw the suspects’ vehicle drive off. Victim #2 identified the first three letters of the suspects’ license plate as “KNY.”

8. On or about June 12, 2022, Victim #3 listed his Apple MacBook Pro on Facebook Marketplace. Victim #3 received a Facebook message from “Deangelo Thomas” who agreed to pay \$2,200.00 dollars for the Apple MacBook. Victim #3 and “Deangelo Thomas” agreed to meet at the Rochester Hills Target. Victim #3 later described “Deangelo Thomas” as a 5’7” to 5’9” black male wearing a white shirt and black pants, with a medium build and short hair. Once Victim #3 and “Deangelo Thomas” arrived at the Target store, Victim #3 exchanged \$2,200.00 for the laptop, and the two went separate ways. Victim #3 later discovered the money from “Deangelo Thomas” was counterfeit. Victim #3 reported the incident to the Oakland County Sheriff’s Office (OCSO), who performed an investigation. The OCSO contacted Target Investigations, who provided video and still-frame images of the suspect as he entered and exited the store prior to meeting with Victim #3. Per the OCSO, the video depicts two suspects arriving at the store at in a white Chevrolet Equinox and stopping in the parking spot north of the doors. One suspect (S1) exited the vehicle and headed towards the front door. As S1 was walking, the driver (S2), moved the vehicle closer to the front door and parked. S1 and S2 both walked into the store and later exited the store a few seconds after one another. As they walk out, cameras captured a clear front facial picture of S1.

9. The OCSO used facial recognition tools to identify S1 as Djuan Davis. An OCSO detective then reviewed Djuan Davis' booking photos, and verified that S1's tattoo on his left inner arm, seen on the Target footage, appears to be the same tattoo visible in DAVIS' booking photos. Additionally, Victim #3 reviewed a photo lineup and identified DAVIS as the person he completed the transaction with.
10. The OCSO further determined that the white Equinox visible on the Target footage had a Michigan license plate of ENT4372. The vehicle was rented from the Enterprise located at 18140 E 9 Mile Rd in Eastpointe, MI.
11. The OCSO obtained and reviewed video footage of A.V., a woman, who rented this white Chevrolet Equinox from the Eastpointe Enterprise store. This video depicts A.V. meeting with a black male with short dreads, who arrived at the Enterprise store in a Silver/Gray Chrysler 300. This man appears to be S2; the man who drove the white Equinox to the Rochester Hills Target store. Based on additional investigation described in this complaint, such as DANIEL's connection to a Chrysler 300 and cellular phone pings, S2 is believed to be Nolan DANIEL.
12. On or about May 24th, 2022, Victim #4 met a person using the name "Deangelo Thomas" on Facebook Marketplace after the two arranged for "Deangelo Thomas" to purchase a PlayStation 5 from Victim #4 for \$650.00.

Victim #4 received thirteen \$50 dollar bills from “Deangelo Thomas” and gave him the PlayStation 5. “Deangelo Thomas” was seen leaving in a silver Chrysler sedan, possibly a 500.

13. Victim #4 thought the bills felt “funny.” Victim #4 went to a gas station and had a clerk test the bills with a money marker pen. Based on the mark left on the notes, the clerk indicated that all the bills were counterfeit. Victim #4 reported the incident to the Troy Police Department (TPD), which began an investigation.

14. The TPD conducted a CLEMIS search and found that on March 8, 2022, Nolan DANIEL received a citation from the Warren Police Department while driving a silver Chrysler 300 with MI license plate of ENY8452. J.G. is the registered owner of this Chrysler 300.

15. The TPD conducted a Facebook search of DANIEL and found that another Facebook user, J.G., was commenting on photographs and other items on DANIEL’s Facebook page.

16. The TPD also conducted a Facebook search of DAVIS, identifying DAVIS’ Facebook moniker as “Juan Wiz.” The TPD obtained records from Facebook, including DAVIS’ Facebook Messenger chats. In one chat, an individual identified as M.P. asked DAVIS about pricing for a rack of currency. (Based on my training and experience, I know that a rack means \$1,000.00.) DAVIS

replied that a rack was \$150.00.

17. These Facebook records further indicated that “Juan Wiz” had provided Facebook with the telephone number (313) XXX-6109. Additionally, police database searches identified this number as DAVIS’s phone number.
18. Finally, these Facebook records indicated that “Juan Wiz” and “Deangelo Thomas” were speaking with each other on Facebook messenger. These messages included discussions between DAVIS and DANIEL arranging to purchase items with counterfeit money.
19. Additionally, Victim #4 reviewed a photo lineup and identified DAVIS as the individual who gave him the counterfeit money.
20. Thereafter, law enforcement conducted a LEIN search of DANIEL, which indicated DANIEL is currently on probation for a weapons offense. The Michigan Department of Corrections (MDOC) indicated that the phone number on file for DANIEL is (313) XXX-6181.
21. Law enforcement obtained and reviewed phone records for (313) XXX-6109 and learned the following:
 - a. Between May 1, 2022, and June 24, 2022, DAVIS’ phone number ending in x6109 communicated (to include calls and text messages) with DANIELS’ phone ending in x6181 a total of 2,862 times.
 - b. DAVIS’ phone number ending in x6109 was at or near several of the

locations stated above at the time of the incidents noted above, as well as additional incidents of similar Facebook Marketplace exchanges for counterfeit bills not mentioned in this affidavit.

22. On July 25, 2022, the West Bloomfield Police Department (WBPD) obtained a signed search warrant from the 48th District Court to be served upon T-Mobile to obtain historical call detail records (CDRs) and to initiate Global Positioning System (GPS) pings for DAVIS' phone ending in x6109 and DANIEL's phone ending in x6181. GPS pings were initiated on July 26, 2022, and monitored until August 18, 2022.

23. On July 26, 2022, Victim #5 drove to Nicholas Party Store located in Livonia, MI for a Facebook Marketplace exchange. Victim #5 had corresponded with a male who used the Facebook Marketplace account in the name of "Deangelo Thomas." Victim #5 was selling his white Play Station 5 Disc Edition and accessories worth \$600.00. Victim #5 stated that when he arrived, "Deangelo Thomas" was in the parking lot driving an older model silver Chrysler 300 with a paper plate and heavily tinted windows. Victim #5 stated that there were three other males in the vehicle.

24. Victim #5 stated that during the exchange, "Deangelo Thomas" appeared nervous and in a rush. "Deangelo Thomas" kept counting and re-counting the money several times before he handed it to Victim #5. Victim #5 accepted the

money after counting it himself, then handed “Deangelo Thomas” the PlayStation. “Deangelo Thomas” got back into his vehicle and left the area.

25. Victim #5 made it to his residence in Garden City before he realized that the money “Deangelo Thomas” provided Victim #5 did not seem normal. Victim #5 went to the Garden City Police Department and advised them of the transaction. Garden City Police tested the money using a money marker and discovered that the bills were counterfeit.

26. Livonia Police Department presented a photo lineup to Victim #5, who identified DAVIS as the passenger in the silver Chrysler 300.

27. GPS ping data places DANIEL’s cellular phone in the area of Nicholas Party Store at the date and time of the incident with Victim #5.

28. On or about August 5, 2022, Victim #6 had his silver 13” Apple Mac Book Pro laptop listed for sale on Facebook Marketplace for \$950.00. Victim #6 listed his cell phone number as a contact method to coordinate a sale. Victim #6 received a call from DAVIS’ phone ending in x6109 and spoke to a male, who identified himself as “Warren.” “Warren” asked general questions about the laptop and told Victim #6 that “Warren” wanted to purchase it for his daughter for school. “Warren” also asked Victim #6 to text “Warren” photos of the laptop to “Warren’s” phone number.

29. “Warren” agreed to purchase the laptop and the two arranged to meet at a McDonald’s in Roseville, MI. “Warren” told Victim #6 that “Warren” would be in a blue Buick.
30. Victim #6 arrived at the Roseville McDonald’s and parked. A black male approached Victim #6. The two men spoke at a distance. After a brief discussion, the male gave Victim #6 nineteen \$50 bills in exchange for the laptop. The male walked off and Victim #6 drove home. After arriving home, Victim #6 discovered that these bills were counterfeit.
31. GPS ping data places DAVIS’ cellular phone in the area of the Roseville, MI McDonald’s at the date and time of the incident with Victim #6.
32. On August 18, 2022, Officers and Agents from the South East Michigan Cyber Fraud Task Force executed search warrants at the addresses associated with DAVIS and DANIEL. Agents did not recover anything germane to the investigation at DAVIS’s home.
33. Inside the master bedroom of DANIEL’s residence, agents located (a) DANIEL, and (b) twenty counterfeit \$50 bills in inside a large dresser. A grey/silver Chrysler 300 with dark tinted windows was parked in front of DANIEL’s residence. As noted above in paragraph 14, J.G. is the registered owner of this car. J.G. lives with DANIEL at the same residence.

34. The counterfeit notes were checked in the US Secret Service Counterfeit Tracking database for any prior history. Most of the counterfeit notes recovered or reviewed did not have a pass history. Based on my training and experience, this indicates that the counterfeit Federal Reserve Notes recovered from DANIEL's residence are new and have not previously been in circulation.

35. Based on this investigation, along with speaking with other law enforcement officers, I have learned that, in addition to the six incidents described above, there have been approximately 35 additional similar incidents involving counterfeit currency throughout Southeast Michigan. These incidents have been investigated by approximately 20 different law enforcement offices. At this time, approximately \$30,000.00 in counterfeit currency passed has passed between these incidents.

CONCLUSION

36. Based on the above information, this affiant submits there is probable cause to believe that DJUAN DAVIS and NOLAN DANIEL, did with intent to defraud, pass, utter, publish and possess counterfeit obligations of the United States, in violation of Title 18 U.S.C. § 472.

Respectfully submitted,



TIMITRE KYRIAKIDES
Special Agent
United States Secret Service

Sworn to before me and signed in
my presence and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Date: October 12, 2022